

IN THE UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

GREGORY THOMAS BERRY, *et al.*, :
 :
 Plaintiffs, :
 :
 v. : Civil Action No.: 3:11CV754
 :
 LEXISNEXIS RISK & INFORMATION :
 ANALYTICS GROUP, INC., *et al.*, :
 :
 Defendants. :
 :
 :

**JOINT MOTION TO CORRECT MISREPRESENTATIONS OF THE WATTS
GUERRA, L.L.P. OBJECTOR GROUP**

Plaintiffs Gregory Thomas Berry, Summer Darbonne, Rickey Millen, Shamoon Saeed, Arthur B. Hernandez, Erika A. Godfrey and Timothy Otten, individually and on behalf of all others similarly situated, (“Plaintiffs”), and Defendants Reed Elsevier Inc., LexisNexis Risk Solutions FL Inc., and LexisNexis Risk Data Management, Inc. (“Defendants”) (collectively, “the Parties”) respectfully file this Joint Motion to Correct Misrepresentations of Attorney Ryan Thompson (“Thompson”) and his law firm, Watts Guerra, L.L.P. (collectively “Watts Guerra”). The reasons supporting the Motion are stated more fully in the accompanying memorandum.

WHEREFORE, the Parties, by counsel, respectfully requests that the Court enter an Order: (1) granting their Joint Motion to Correct Misrepresentations of the Watts Guerra, L.L.P. Objector Group; (2) entering the proposed Order Granting Emergency Relief attached as Exhibit F to their Joint Memorandum in Support; (3) awarding the Parties their costs and expenses incurred herein; and (4) granting the Parties such further relief as the Court deems appropriate.

**GREGORY THOMAS BERRY, SUMMER
DARBONNE, RICKEY MILLEN,
SHAMOON SAEED, ARTHUR B.
HERNANDEZ, ERIKA A. GODFREY, AND
TIMOTHY OTTEN, individually and on
behalf of all others similarly situated**

**LEXISNEXIS RISK SOLUTIONS FL, INC.,
LEXISNEXIS RISK DATA MANAGEMENT,
INC., AND REED ELSEVIER, INC.**

By: /s/Leonard A. Bennett

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on the 21st day of October, 2013, I electronically filed the foregoing Joint Motion to Correct Misrepresentations of Attorney Ryan Thompson and Watts Guerra, L.L.P. with the Clerk of Courts using the CM/ECF system, which will send notification of such filing to CM/ECF participants, and I hereby certify that I have mailed by United States Postal Service the document to any non-CM/ECF participants.

/s/Leonard A. Bennett

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Counsel for Plaintiffs

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